

IN THE
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF WEST VIRGINIA

42 U.S.C. 1983
BIVENS - COMPLAINT

JEREMIAH S. FARMER
PLAINTIFF

V.
BOP DIRECTOR,
REGIONAL, AW GABBY,
S.I.S. LT. CRUZ, AND
RETIRED S.I.A. Et al.



FILED

SEP 10 2021

U.S. DISTRICT COURT
ELKINS WV 26241

3:21cv 147

Giroh Trumble Sims

- ① This civil action is a Bivens law suite.
- ② Farmer has filed previous civil litigation, Farmer v. Spears, Farmer v. Talbot. These case settled out, Farmer won.
- ③ DEFENDANTS VIOLATED THE 4th-14th Amendment, 5th Amendment, 8th Amendment, for cruel and unusual punishment, excessive force, Deliberate-Indifference, torture, sexual assault, 18 U.S.C. § 241, 18 U.S.C. § 242, 18 U.S.C. § 245, 18 U.S.C. § 271, Rule of Conduct 3420.11, Restraints 5566.06, INADEQUATE HEALTH And mental health care; Deprivation of the administrative remedy process, due process of law violation, presculed not returning mail that Farmer send mail to attorneys for request of counsel, psychological pain and physical, emotional pain/suffering.

- ④ Punitive damages Farmer seeks \$900,000
- ⑤ Compensatory damages Farmer seeks \$900,000
- ⑥ Farmer also request the officers involved terminated from BOP employees and file criminal charges against them most serious.
- ⑦ Farmer also request pursuant to 28 C.F.R. § 115 to contact (PREA) for him and others.
- ⑧ Farmer also respectfully requesting a Preliminary injunction for my safety, pursuant to 18 U.S.C. § (402)(a) & to prevent retaliation for speaking out 18 U.S.C. § (997)(c) and Farmer relies on case law as in HARTMAN V. MOORE.
- ⑨ Not only is my life in danger, others is as well & for
- ⑩ Farmer respectfully requesting a court order to have the VSP Hazelton administration to save all recorded footage of June 6, 2021, June 7, 2021 1 range, 4 range, June 8, 2020 recorded footage of 4 range, DHP range. & save camera footage watching used on June 6, 21, and all fax, logs, notes regarding this incident to be saved
- ⑪ If a 42 U.S.C 1983 BIVENS & Farmer papers forms is needed please file this complaint the exhibits and send those form by certified mail ONLY. Security purposes.
- ⑫ \$400⁰⁰ fee paid in full check is on its way to the clerk of courts for this civil action.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF WEST VIRGINIA

DATE: 7-16-21

TO: UNITED STATES FEDERAL JUDGE;

FROM: JEREMIAH SHANE FARMER, REGISTER #16931-027

REASON FOR COMPLAINT: Hello, my name is Jeremiah Shane Farmer, #16931-027. I'm a "FEDERAL INMATE" and I'm being housed in the United States Penitentiary at Hazelton West Virginia, This is where my complaint occurred, see AFFIDAVIT/DECLARATION as follows;

A. FACTUAL BASIS & BACKGROUND

AFFIDAVIT/DECLARATION

Comes Now, inmate Jeremiah Shane Farmer, #16931-027 and submits the following declaration in support of my motion for seeking relief from the prison guards at Hazelton U.S.P, this complaint & AFFIDAVIT/DECLARATION stating as follows;

(1) This complaint involves of a physical & sexual assault, cruel & unusual punishment, excessive force, Substantial Due Process violation, & Torture by prison guards at U.S.P. Hazelton, On June 6, and June 7 2021.

(2) Administration here in Hazelton deliberately interferes with the administrative remedies process by not responding or returning my filed BP 8- BP 9 complaints so I file sensitive BP-10 to regional office and they decline it with my reports are not sensitive and to file my complaint through my prison administration, these denied sensitive BP 10 Remedy ID 1086071-RI and 1086700-RI.

(3) Due to my sexual assault by prison guards, burning my penis leaving two fresh scars I'm respectfully requesting for the courts to contact (PREA) 28 C.F.R. § 115.

(4) Due to my life being threatened, in danger, from being physically beaten while in hand cuffs to the extent medical determined that my left ear drum was busted, I had 2 black eyes, busted lip, bruises on my face and forehead, cameras also support this claim along with dozens of employees. I have scars on my belly, sides, back and the next day on June 7, 21 there were deep lacerations with dozens of blisters. Woe my today scars are and that was from the belly chain and my wrist and ankles has scars on them today from the handcuffs and shackles and on June 7, 21 there were deep lacerations and blisters. I also have 2 scars on my penis from LT Cookly burning it with a cigarette, and LT B. Jenkins was the officer that brutally beaten me while I was hand cuffed behind my back and in shackles, punching me in my face with both hands busting my left ear drum and officers WOTRIG, DEEVERS, MCDUFFY, FRIEND, WILES stood and watched be getting brutally beaten, bloody, and did not intervene. LT Cookly as I was being restraint and held down by officers and hold my head to the left burned my penis twice. He ask for a cigarette then I believe Wiles said here and laughed. I did not smell a cigarette but Cookly mention my case as he bent over I felt a tuggle at my shorts and 2 burns on my penis and guards laughed and Cookly left. This all happen on June 6, 21 and June 7, 21. The room was on one range, one cell on camera on 4 range. On June 6, 21 I was being moved.

from cell from 210 - to - 209 while was handcuffed behind my back hold my tied sheet full of my property, prison guards Gerald CRUM, and another officer slammed me to the ground and one officer was trying to break my leg, for all the reasons above I'm respectfully requesting a ("T.R.O.") Temporary restraining order and requesting a Preliminary Injunction for my safety, 18 U.S.C. (4042(a)) & to prevent retaliation for speaking out 18 U.S.C. (1997(a)) HARTMAN V. MOORE.

(5) I was left in the cell on one range one cell for 24 hours in full restraints and this violated (OFFICER Code of conduct 3420.11 & Restraints policy 5516.06

"There was no camera in the cell and this is policy with it was not padded as required.

(6) These prison guards do this misconduct brutally beating and sexually assaulting inmates very frequently here in Hazelton, and have even killed inmates but then fabricated the incident reports. to justify their murders.

(7) My life is in danger, please react with urgency and grant my restraining order request along with contact (PREA) my claims are all facts supported by a preponderance of evidence, medical and psychology refuses to provide my records to add as exhibits to this request.

Respectfully Submitted

15/ Jeremiah S. Farmer
JEREMIAH FARMER #16981027

"I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT Executed on 7-16-21

SEE Attached exhibits: X1

Respectfully Submitted
15/ Jeremiah S. Farmer
JEREMIAH S. FARMER
#16981027
C.I.S. P. HAZELTON
P.O. BOX 2000
BRUCCON MILLS, WV 26525

UNITED STATES OF AMERICA }
 NORTH DIST WEST VIRGINIA }
 UNITED STATES DIST COURT }

AFFIDAVIT

JEREMIAH FARMER, the plaintiff deposes and States as follows;

① The administration has stopped incoming outgoing mail to the extent I must certify my mail and the receiving mail must be certified in order for me to receive it.

② Farmers administrative remedy process has been denied by USP Hazelton administration in a desperate attempt to maliciously and Sadistically deprivation of the administration remedy process.

③ Farmer has made a reasonable attempt to obtain counsel and administration has denied incoming mail maliciously and Sadistically precluded Farmer from doing so. 28 U.S.C. § 1915(d)

④ Everything said in this civil action 1983 H.C. 42 U.S.C. 1983 "BIVENS" civil action is based on facts supported by a preponderance of evidence and Justice will be better served if Farmer was appointed counsel, and the court accept this civil action.

⑤ Farmer has written the court 5 times since June 6, 2021 beating sexual assault by prison staff here at USP Hazelton specifically requesting 42 U.S.C. 1983 on Forma Pauperis forms and this court has not either received my mail or did receive my mail and these corrupt Police insured I didn't receive it.

⑥ I have continuously requested prison employees to send me 42 U.S.C. 1983 Form Papyrus forms and it's been to no avail there fore I've made a 42 U.S.C 1983 Form to the best of my ability. to just get it filed and if need be send me both a 42 U.S.C 1983 & Form Papyrus forms by "CERTIFIED MAIL" and I will hopefully receive it.

These are serious allegations I been denied library services, police never hired, they stopped all my live ones correspondence directly following June 6, 2021, sexual assault physical assault.

Due to this, justice will be better served to appoint former a attorney as soon as possible so it will ensure the due process right wont be violated.

⑦ Farmer forwarded a \$40000 check to pay full payment for filing fee.

⑧ Other prisoners has been tortured/sexually assaulted by prison staff here, This suite will hold these officers accountable for their criminal actions.

⑨ I attempted dozens of ~~trapped~~ ^{trapped} ~~administrative~~ ^{administrative} remedies as new per (PLRA) but administration stopped it. I then sent sensitive BP10 to Regional about my sexual assault physical assault and that administration have went respond to my filed BP8- BP9 and the Regional responds back denied, not sensitive, file BP9 at facility. These can be viewed Remedy 10 1086071-R1 and 1086700-R1.

NEXT page is the Defendants all of them violated 18 U.S.C 241; 18 U.S.C § 242; 18 U.S.C § 245(b)(1) And 18 U.S.C 271. see next page

ALL DEFENDANTS IN THIS CIVIL ACTION VIOLATED THE FOLLOWING

TRULINCS 16931027 - FARMER, JEREMIAH SHANE - Unit: CCC-E-A

① 15

FROM: 16931027

TO: E. Shanon

SUBJECT: legal

DATE: 11/24/2019 08:49:48 PM

(A) LEGAL SUPPORT AND STANDARD IN
SUPPORT OF THE GOVERNMENTS U.S.P. EMPLOYEES
VIOLATIONS

- ① 18 241. CONSPIRACY AGAINST RIGHTS: If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any state, territory, common wealth, possession or district in the free exercise or enjoyment of any right or privilege secured by him and the constitution or laws of the United States or because of his having so exercised the same.
- ② 18 242. DEPRIVATION OF THE RIGHTS UNDER COLOR OF LAW: Who ever under color of any law, statue, ordinance, regulation, or custom, willfully subjects any person in any state, territory, common wealth, possession, or district to the deprivation of any rights, privileges, or immunities, secured or protected to the constitution or laws of the United States, or to the different punishments, or penalties an account of such person being an alien, or to reason of color, or race, than are under this title or imprisoned not more then year or both; and if badly injury results from acts committed in violation of this section or of such acts includes the use of weapon of dangerous weapon or in person.
- ③ 18 245. FEDERALLY PROTECTED ACTIVITIES: (a) (1) Nothing n this section shall be contracted as indicating an intent on the part of congress to prevent any state, any possession of common wealth of the United States, or the district of Columbia, from exercising jurisdiction over any offense or which it would have jurisdiction in the absence of this section nor shall anything in this section be construed as depriving state and local law enforcement authorities of responsibility for prosecuting acts that may be violation of this section and that are violation of the state and local law. No prosecution of any offense described in this section shall be undertaken by the United State except upon the certification in writing of the deputy attorney generals or any associate attorney generals. or assistants attorney generals or any by the attorney general that his judgment a prosecution by the United State is the public interest and necessary to secure substantial justice, which function of certification may be delegated.
- (2) Nothing in this section shall be construed to limits the authority of federal officers, or federal Grand jury, to investigate possible violations of this section.
- ④ 18 271. CONSPIRACY TO COMMITTEE OFFENSE OR DEFRAUD UNITED STATES: If two or more persons conspire to commit any offense against the United States, or any public agency there of in any manner or foe any purpose and one or more of such persons do any act to effect the object of the conspiracy, each shall be fined under this title or imprisoned not more then five years.

→ 1 DEFENDANTS CHARGED WITH ABOVE ←

STATUTES AND U.S. RIGHTS VIOLATIONS AS FOLLOWS:

- | | | |
|-------------------------------------|--------------------|------------------------------|
| ① BOP DIRECTOR | ⑫ CO WILES | ②④ DHO CRADDOCK. |
| ② REGIONAL | ⑬ CO WOTRIG | ②⑤ MEDICAL DOCTORS |
| ③ U.S.P HAZELTON WARDAN; | ⑭ CO FRIEND | ②⑥ PILES/SUPERVISOR. |
| ④ U.S.P CAPTAIN ^{34 Gabby} | ⑮ CO DINGRESS | ②⑦ MIMS, et al. |
| ⑤ SIA | ⑩ DEAVERS | PIAINTIFFS WITNESSES |
| ⑥ S.B.S. LT. CRUZ | ⑪ MCDUFFIE | NURSE MCKENZIE, THORPE |
| ⑦ LT. COAKLY | ⑪ MARSHAL | GRAM, FOX, HAIR, HANA, |
| ⑧ LT. B. JENKINS | ⑪ CO G. CRUM | LT. WARE, Chaplin Keyes, |
| ⑨ LT. JAMES/ | ②⑧ ROUSH | Mental health, ELLIS, SHIRK, |
| ⑩ LT. CARR | ②⑨ C. DAVIS | HUAET, G. MILLER, ARMEL |
| ⑪ PYSch. MS BROWN | ②② WARDAN | INMATE MAJOR NED MCCOY |
| | ②③ S. Hixenbaugh 8 | 522 48-424 |
| | ②④ BARLOW #23A | |

~~Bol Director pg 1~~
 1 DEFENDANT # 1

(2)

2 BOP DIRECTOR

3 R A. ARGUMENT

4
 5 (1) All injuries Farmer received from USIP
 6 Hazetton police, all conduct the administration
 7 Uses such as physical assaults, sexual assaults
 8 bondage, full body restraints so tight it caused
 9 deep lacerations, blisters, bruises, scars then
 10 denying Farmer the administrative remedies
 11 process, CI Barlow Ikenbaugh not walk 4 range
 12 not providing legal copies, BP8 or responding
 13 to BP8, Aw assistant not responding to the
 14 filed BP9, deprivation of the administrative
 15 remedy process, violation Due process of law
 16 by denying legal library services, legal work that's
 17 been in R&D for 4-5 months ignoring Farmer's
 18 deadline, for direct appeal.

19 Regional ignores the complaints on police
 20 beating inmates up, Shil won't contact preal
 21 Some police beat up inmates and don't get
 22 disciplined able to eventually do the same to
 23 Farmer. never being fired.

24 (2) Medical delay in medical treatment,
 25 Deliberate indifference, witnessing Farmer's
 26 physical injuries black eyes, busted lip, swollen
 27 eyes, bent fingers, medical never taken pictures
 28 medical 2 weeks later on June 16, 21 discovered
 29 Farmer left ear drum was busted and fingers,
 30 thumbs all bent not normal back pain, and
 31 Shil never being sent to outside professionals.

~~BOP Director pg 2a~~

1 leaving Farmer in pain and suffering. (3)

2 Inmates have been killed by USP employees and

3 never being fired due to filing false incident

4 reports. Inmate Dengel Palmer 53453-330 was

5 brutally beaten by LT. Coakley, PREA was contacted

6 by the hospital and pictures was taken by the

7 hospital some injuries farmer received after Coakley

8 done the same to Palmer.

9 10 B. DEFENDANT VIOLATIONS

11
12 ① BOP DIRECTOR is responsible for all

13 actions done by his employees. Eighth, Fifth,

14 Fourth - Fourteenth amendment & Due

15 process violations, Deprivation of Administrative

16 remedies & Due process rights. Deliberate Indifference

17 Cruel & unusual punishment, physical,

18 sexual, Mental abuse by Hazelton staff.

19
20 ② Officer code of conduct 3420.11 &

21 Restraints 5566.06 violations

③ BOP DIRECTOR ABUSE OF DISCRETION & AUTHORITY

DEFENDANT #2

4

REGIONAL

A. ARGUMENT

① Regional, has disregard the police misconduct knowingly and intentionally at U.S.P Hazelton, allowing inmates with plaintiff Farmer to be physically, emotionally, mentally, and sexual abuse by prison staff while turning a blind eye, without staff being held accountable for this blatant misconduct and criminal conduct.

② On July 7, 21 Farmer received a sensitive BP10 back from regional, that specifically stated how administration won't respond to his filed BP8- BP9 regarding how police brutally beaten, physical and sexual assault and Regional returned the complaint Remedy ID 1086071-R1 and regional response was this was not a sensitive issue to file BP9 with my facility. And again for another filed sensitive BP-10 ID 1086700-R1 some response by regional.

③ This is Negligence on Regional part.

③ DEFENDANT VIOLATIONS

8th, 5th, 4th & 14 Amend violations - Abuse of discretion & Authority

① Regional deprivation of administrative remedies process, turning a blind eye to their employees misconduct and criminal conduct violated officer code of conduct 3426, 11 and restraints 556b.06.) Deliberate Indifference.

① DEFENDANT # 3

WARDEN

5

② DEFENDANT # 3A

ASSIST. AW GABBY

A. ARGUMENT

(1) On June 6, 2021 & June 7, 2021 Farmer was brutally beaten, sexually assaulted, treated with a malicious and sadistic intent and treated with cruel and unusual punishment, and tortured for approx 24 hours. By the warden and AW Gabby being the top supervisors of this official capacity and allowing there officers to repeatedly physically beat prisoners and turning a blind eye not disciplining these same officers they were able to do what they did to me.

(2) AW Gabby, Captain walked for the first time on July 9, 2021 and I showed captain my injuries complaining about how police beat and tortured me, sexually assaulted me. Captain walked away. AW Gabby I complained to as well and ask him why when I turn in BP9 to the Warden and BP8 to counsellor they don't get responded to, he said there is a investigation on it that's why.

③ I complained to AW Gabby / Captain about being denied my Legal material that in R&D and Library services they showed intrest but no results.

WARDEN PG 2

6

④ AW Gabby, Warden, Captain has continued to show reckless disregard to his officers beaten prisoners, and interfering with the administrative remedies process stopping incoming and outgoing mail.

⑤ Farmer is on direct appeal and currently serving a life sentence and denying law library services and legal material that in R&D has violated Due process of law rights.

⑥ DEFENDANTS VIOLATIONS

① U.S. CONST. VIOLATIONS; Eighth, Fourth-Fourteenth, Fifth Amendment, & Due process of law violations.

② CRUEL & UNUSUAL punishment; sexual assault; Forcing to live in inhumane living conditions; Abuse of discretion and authority; Negligence; Deliberate Indifference.

③ officer code of conduct 3420.11 and Restraints 5566.06, & 28 C.F.R. § 115(PREA) Violations.

④ DEPRIVATION OF ADMINISTRATIVE REMEDIES
PROCESS & DUE PROCESS RIGHTS

~~Captain pg 1~~

7

DEFENDANT # 4 CAPTAIN

A. ARGUMENT

(1) Captain is the over see of his officers and LT Cookley has been shu LT, and has repeatedly beaten, placing inmates in full restraints tighter then its able to go causing blisters, scars, deep lacerations, and Captain turns a blind eye.

(2) Captain is aware of administration not allowing the administrative remedies from being completed, stopping Farmers incoming and Outgoing mail and not doing anything about it.

(3) Captain aware of Counsellors Barlow & S. Hixenbaugh not walking 4 range for over 3 months and this forces Farmer to send BP8 by mail to them which won't be responded to.

(4) Captain aware of Farmers property in R&D for months and that Farmer direct appeal is due August 23, 2021 and staff not allowing Farmer to go in law library for legal researching for his legal cases criminal & civil, blatantly violating Farmer due process rights.

B. DEFENDANT VIOLATIONS

8

1 (1) U.S. CONST. VIOLATIONS, Eighth, Fourth-
2 Fourteenth, Fifth Amendments, and
3 Due process of law Violations.
4

5 (2) Captain Over sees his officers therefore
6 he is responsible for all there actions
7 Excessive force; sexual assault; Cruel and Unusual-
8 punishment; Abuse of discretion and
9 Authority.

(3) Officer Code of conduct 3420.11 and
Restraints 5566.06, & 28 C.F.R. § 115 (PREA).

(4) DEPRIVATION OF DUE PROCESS &
ADMINISTRATIVE REMEDIES PROCESS

S.I.S. pg 1

DEFENDANT # 5

S.I.A. "RETIRED"

(9)

DEFENDANT # 6

S.I.S. LT. CRUZ

A. ARGUMENT

(1) June 6, 21 & June 7, 21 officers physically, sexually assaulted Farmer, blacken both eyes, busted nose fat lip, busted left ear drum, tied up body restraints 24 hours, leaving deep lacerations on stomach sides back, with blisters, some for the wrist for the handcuffs, and some for the ankles from the shackles.

(2) Nurses HANA, GRAM, THORPE & Mckenzie scene the injuries, Mckenzie reported back to Mims, and no pictures was taken of the injuries and on June 8, or June 9 2021 before meeting with DHO craddock nurse mckenzie & Thorpe reviewed my injuries and put a finger splint on my finger. DHO craddock said he has to report police misconduct.

(3) On June 8, or June 9, 2021 mental health Huaet reported the incident to S.I.A. via email and explained the injuries Farmer sustained.

(4) Farmer sent S.I.A and S.I.S request on 6-7-21, 6-11, 21, 6-15-21 never responding or meeting with Farmer.

Sils Page

10

⑤ NURSE HAIR Scene Farmers injuries deep

lacerations, puss, blisters on his body black eyes
busted lip, damaged picky, thumb and Hair
ordered ointment for Farmer. 6-12-21

⑥ June 18, 2021, Farmer reported the sexual
assault and showed Nurse McKenzie two burn
circles from LT. Coakley and I told him to contact
PREA he said he has to tell Sils and he done
that. 4 range

⑦ June 22, 2021 I spoke to chaplin Keyer
cried to him, in fear of my life, showed him
the injuries I sustain from the physical and
sexual assault ask him to contact outside
sources because the employees here at
Hazelton are covering it up and Keyer said
a prayer for me and promise he would
contact outside source. 4 range at 9:17am.

⑧ 6-7-21, 6-11-21, 6-15-21 I filed BP8 and BP9
not receiving any response.

⑨ 6-23-21 Farmer met with DHO Craddock
regarding incident report then Farmer
reported the sexual assault, against Coakley
Carnal knowledge, DHO said he will report
it I told him report outside of this facility
because all trying to cover it up, and Sils,
S.I.A, captain, warden no one has even spoken
to me about the June 6, June 2, 2021 incident
he said he would report it to outside source.
I ask DHO Craddock to request all video footage
on 4 range, one range, and camera footage
Wating had,

SLS. pg 3

11

1 ⑩ On 6-25-21 on 4 range approx. 11:00 am
2 Farmer spoken to Mental health Huact about
3 the sexual & physical assault incident on
4 June 6, and June 7, 2021 explained to her SLS.
5 Still has not spoken to me and she was "SHOCKED"
6 She said she will again report it.

7 ⑪ On 6/24/2021 between 1:00-1:20 pm approximately
8 Farmer finally spoken to SLS, LT. Cruz and another
9 SLS. "18" days after the incident on June 6, June 7,
10 2021 showed him my injuries explained in brief
11 convo. what happened he ended the interview
12 within 10 min. after he taken pics of the two
13 burn holes on my penis, scars around my stomach
14 sides back and and ask me when this happened
15 that he was not aware of this incident, despite
16 the fact it's been reported to SLS numerous times.
17 first time was on June 8 or June 9, 2021 by mental
18 health, then again on 6/25/21, then Nurse Mkenzie
19 on June 18, 2021 all can be reviewed on computer
20 data.

21 ⑫ On June 15, 2021 Farmer forwarded A sensitive
22 BP-10 to regional regarding Farmer being
23 physical & sexually assaulted and explained
24 that administration won't respond to filed BP8- BP9
25 and I'm forced to file BP10 and Regional responded
26 on July 1, 21 remedy ID 108607-R1 and said the
27 incident was not a sensitive matter to file BP9
28 through my institution, totally disregarding Farmers
29 Complaint and what he told them that his institution
30 is preventing the administrative remedy process.
31 I forwarded BP10- & BP11 to central office not
32 ever receiving response back.

SILS pg 4

12

- ⑩ On July 12, 2021 filed BP number 1086700-BI was returned regarding physical/sexual assault tortuering by prison staff, and explained that administration won't respond to filed BP8-BP9 and my lifes in immediate danger so I am filing a sensitive BP 10, Regional response was thw was not a sensitive matter. file BP9 through your facility.
- ⑪ On June 16, 2021 Farmer was scene by medical for X-rays on back, finger, nose, and only the back showed L3-L4-L5 herniated disk LT. WARE witnessed this and Doctor also notice that my left ear drum was busted.
- ⑫ Inmate Daniel Palmer 53453-350 was beaten same as Farmer some consistent injuries and Palmer went to the hospital and staff taken pictures of Palmer injuries, this incident happen before June 6, 21 incident with me, some LT, Coakley involved and he has not been fired. Still works as LT, in shu.
- ⑬ Silis or Sil, A never contacted PREA as I requested.
- ⑭ June 21, 2021 I handwritten ① Federal Bureau of Prisons; ② Office of Government ethics; ③ Central office X2; ④ West Virginia US Court never receiving a response back.
- ⑮ June 23, 2021 I contacted by mail ① Inspector General Invest. Division; ② ACLU ③ Attorney Mahell, never receiving a response back.
- ⑯ June 28, 21 I written West Virginia U.S court never receiving a response back.

S.I.S pg. 5.

13

① July 12, 2021 I written civil rights Commission and Central office not receiving a response back.

① July 13, 2021 I written ① office of professional-responsibility DOJ misconduct; ② U.S. Dept. of Justice-civil rights division not receiving a response back

① July 14, 2021 I wrote ① ~~Central~~ Central office not receiving a response.

B. DEFENDANTS VIOLATIONS

① U.S. Const violations, Eighth, Fifth Fourth and Fourteenth Amendment Due process violations

② Negligence, conspiracy against rights

③ violations of Code of conduct 3420.11 restraints 5546.06 & 28 C.F.R. § 115 (PREA)

④ DEPRIVATION OF ADMINISTRATIVE REMEDIES AND DUE PROCESS OF LAW.

⑤ FAILURE TO INVESTIGATE, DELAY IN INVESTIGATING AND NOT DISCIPLINING OFFICERS FOR their misconduct

S.I.S. LT. HART met with Farmer on June 11, 21 about Farmer being beaten/sexually assaulted he said he was PREA, S.I.A. retired, S.I.S. LT. Cruz lost his position. Now LT. HART took over for Cruz and new S.I.A. took over for S.I.A. defendant whom retired.

~~LT. COAKLEY pg 9~~DEFENDANT # 7
LT. COAKLEY

14

A. ARGUMENT

1
2 (1) LT. COAKLEY ordered officers WOTRIG, WILES
3 FRIEND To use excessive force and sexually
4 violate Farmer by throwing him to the floor
5 while handcuffed and shackled, stripping the
6 clothes off of Farmer to replace it with paper
7 clothes.
8 (2) While Wotrig worked the camera guards
9 forcing Farmer's head and upper torso down
10 making him walking backwards as Farmer yelled
11 his back hurts, then guards placed Farmer in
12 a wheel chair and rolled him to one range
13 cell one.
14 (3) While handcuffed and in shackles LT. COAKLEY
15 ordered Farmer to lay on his back on the bed
16 as guards held Farmer, forcing his head to the
17 left wall the side COAKLEY was on he began
18 putting a belly chain on my stomach sides back
19 so tight making it hard to take deep breaths, then
20 Coakley put on a black box and tighten the hand cuffs
21 so tight, causing blood circulation to make my
22 hands wrist lower forearms swell, lack of circulation.
23 Then Coakley also strategically locked the black
24 box pinch my stomach skin in the box. Coakley
25 ask the guards for a cigarette and I heard I believe
26 not sure but sounded like wiles give him something
27 and chuckled then Coakley said remember those
28 people you killed, then he burned my penis I scream
29 and he done it again, I screamed again.

LT. Coakley pg 2

(15)

- ④ Ulmetley Coakley placed Farmer in belly chain black box, handcuffs & shackles from approx 8-9 am on June 6, 2021, until he and nurse hang came the following morning of June 7, 2021 check my vitals and then removed black box, belly chain handcuffs. This restraints prevented Farmer from using the restroom and forced him to urinate on himself.
- ⑤ Farmer had a LT. hold on him since arriving at U.S.P Hazelton then on June 6, 21, after LT. Coakley did not participate in my cell change crew slammed me I ask LT. why wasn't you there, he responds "oh I took that LT. Hold off, he he"
- ⑥ LT. Coakley denies legal law library services violating due process rights

B. DEFENDANT VIOLATIONS

(1) EXCESSIVE FORCE; DELIBERATE INDIFFERENCE; SEXUAL ASSAULT; ABUSE OF DISCRETION & AUTHORITY; DEPRIVING LIFE-LIBERTY & PROPERTY; CRUEL & UNUSUAL PUNISHMENT.

(2). U.S. CONST. VIOLATIONS EIGHTH, FOURTH, Fourteenth, Fifth Amendment violations & Due process rights violations.

(3) VIOLATIONS OF 3420.11 officer code of conduct; 5566.06 Restraints and 28 C.F.R. § 115 (PREA) violations.

(4) DEPRIVATION OF ADMINISTRATIVE REMEDIES AND DUE PROCESS RIGHTS

1 DEFENDANT # 8

2 T. B. JENKINS

3

4

5 A. ARGUMENT

6 (1) June 6, 2021 Approx. 9-11 A.M., LT B. JENKINS
 7 Arrives in cell one on 1 range in the SHU shortly
 8 after Wotrig taken a picture of Farmer, Jenkins
 9 says something to Wotrig he then turned away
 10 and shut the camera off. Unit team - counselou
 11 Deavers, Mcduffie came in the cell as Jenkins
 12 did. Wiles, Friend had pushed, rammed Farmer
 13 in cell wall with the shield while he was
 14 in restraints, then Jenkins told them Wiles, Friend
 15 to let Farmer go, and directed Farmer to
 16 Stand in Front of Jenkins, Farmer told Jenkins
 17 "he didn't do shit" Jenkins began brutally striking
 18 Farmer on both sides of his face. Approx. a dozen
 19 times as Wiles, Friend, Mcduffie, Deavers and
 20 Wotrig stood and watched not once intervening.
 21 During this attack Farmers left ear drum was
 22 busted as medical observed on June 16, 21 and
 23 Farmer received two black swollen eyes, damaged
 24 nose, fat busted lip.

25 (2) On June 6, 21 after the brutal attack
 26 on Farmer while he was handcuffed behind his
 27 back and in shackles, Coakley had put on the
 28 belly chain, black box handcuffs in front left
 29 and Jenkins came back in the cell as wiles
 30 and Friend rammed Farmer into the wall

31 repeatedly cause intense pain to the locked box
 32 cuffs wrist, and LT Jenkins began pulling

1 Jenking, bending Farmers fingers, thumbs, and
 2 causing pain as Farmer begged him to stop,
 3 Jenkins encouraged Farmer to spit on him or
 4 head butt him, so Goute "He can kill me get away
 5 with it with filing a falsified incident report,
 6 "Only if you knew!"

7 ③ Farmers injuries from L.T.B. Jenkins were
 8 physical, emotional, psychological pain. Causing
 9 both eyes to be black, swollen, knots on face
 10 head, busted damaged nose, busted fat lip,
 11 damaged thumb, pinky, Farmer was in fear that
 12 he was going to be killed.

13 Today is August 10, 21 2 months after this
 14 brutal, attack & torture and everytime Farmer
 15 or his cellmate Major Neo McCoy # 52248-424
 16 hears the guards coming on the range, Farmer
 17 and his cell mate fear that they are coming
 18 to physically assault- Attack or kill them,
 19 McCoy scene the injuries Farmer received
 20 when he came back into the cell with McCoy.

21 B. DEFENDANT VIOLATIONS

22
 23
 24 ① U.S. CONST. VIOLATIONS, EIGHTH, FIFTH,
 25 FOURTH-FOURTEENTH AMENDMENT VIOLATIONS

26
 27 ② EXCESSIVE FORCE; DELIBERATE INDIFFE-
 28 RANCE; TORTURE; CRUEL & UNUSUAL-
 29 PUNISHMENT; ABUSE OF DISCRETION & AUTHORITY.

30
 31 ③ VIOLATIONS OF; ① OFFICER CODE OF CONDUCT
 32 3420.11; RESTRAINTS 5566.06

1 DEFENDANT # 9

18

2 LT. JAMES

3 A. ARGUMENT

4 (1) LT. James released Farmer from restraints
5 sometime on June 6, 2021 pm and his officers
6 Wiles, dingress left Farmer in restraints until
7 the following morning of June 7, 2021 between
8 8-9 am.

9

10 B. DEFENDANT VIOLATIONS

11 (1) U.S. Const. violations, Eighth, Fourth and
12 Fourteenth amendment & Due process
13 violations.

14

15 (2) Excessive Force, cruel & unusual punishment,
16 Abuse of Discretion and authority; Negligence.

17

18 (3) Violations of (1) officer code of conduct 3420.11

19 (2) Restraints 5566.06

DEFENDANT # 10

LT. CARR

19

A. ARGUMENT

(1) Sometime during mid evening LTCARR, officer Marshal, Three nurses; McKenzie, Graham, & Thorpe came to check my vitals and the tightness of the cuffs and before the nurses could check Farmers vitals

Farmer pointed out the blood splatters on the walls & floor where police LT. Jenkins brutally beaten me, Carr rushed the nurses out of the room without checking my vitals. These officers and nurses only came

When I showed officer ROUSH how my hand were swollen, purple, blue, with my feet and toe nails from the tightness of the restraints.

After LT. Carr rushed out the nurses I begged him to loosen up the restraints, and the black box pinching my belly skin Carr responds, "I'm not messing with that Coakley put them on!"

(2). Between 12:00-3:00 Am on June 7, 2021

I showed officer C:DAVIS my hands lower arms and fingers, feet swollen, purple, blue skin and finger nails, toenails and expressed the pain I'm feeling to call LT. I ended up loosing consciousness urinating on myself

laying on my back LT. Carr and Marshal arrive yelling for me to get up, I could not-

1 due to the pain, and mentally, psychologically
 2 broken confused, disorientated, eventually LT. Carr
 3 and Marshal come and lift me up on to the
 4 bed, and a few minutes later I
 5 ask Carr to please loosen up the restraints
 6 he again blame it on Cookley. I tell Carr that
 7 them nurses that he rushed out of here won't
 8 lie when they get subpoena like your officers will
 9 and Carr looked at Marshal told him to not tell
 10 Cookley and he loosend the restraints and open the
 11 black box to release the skin on my stomach a
 12 locked the black box. Then left me in restraints.
 13 (3) During 6/6/21 while nurses McKenzie, Thorpe
 14 was in the cell I told them how police beaten
 15 me, officer Friend said "That wasn't shit!"

16 B. DEFENDANT VIOLATIONS

- 17
 18
 19 (1) U.S. CONST. VIOLATIONS; Eighth, Fourth-
 20 Fourteenth, Fifth Amendment violations,
 21 AND DUE PROCESS VIOLATIONS.
 22
 23 (2) EXCESSIVE FORCE, CRUEL & UNUSUAL-
 24 Punishment, Torture, Negligence.
 25
 26 (3) Violations of; 342a11 officer code of conduct
 27 5566.06 Restraints violations
 28
 29 (4) Abuse of discretion and Authority

LT. CARR NEXT VIOLATIONS:

① Violating Farmer's Due process Rights by throwing away Farmer's legal mail file motions, that Farmer gives to Co Fried to give him, LT. Carr told him he don't have it no more.

(23)

DEFENDANT # 11

PSYCHOLOGY MRS. BROWN

A. ARGUMENT

① Mrs. Brown is aware of the brutal physical and sexual attack by prison guards on June 6, 21 and June 7, 21 and how Farmer has been denied library services for his appeal, how police has stopped incoming even out going mail for Farmer and she sees Farmer steady being written up having difficulty conforming to prison rules and regulations and cited for disciplinary infractions.

Ms Brown is aware that holding mentally ill prisoners in segregation for long periods of times is harmful to Farmer mental illness.

See case Mass v. Dapabue, No. 2:05 cv-37 (S.D. Ind); (2010 U.S. Dist Lexis 41896) and 2012 U.S. Lexis 182974.

These cases speaks of holding mentally ill prisoners in long term segregation violates the eighth Amendment cruel and unusual punishment.

Experts testified in these cases that a mental illness is a biologically based brain disorder that has behavioral manifestations, and some functional manifestation, and some psychological manifestation. Courts use the term mental disorder.

American Civil Liberties Union and Indiana Protection Advocacy services filed civil litigation against I.D.O.C on holding mentally ill prisoners in segregation for long periods of times is harmful to these prisoners based on extensive evidence presented in this case.

the court found that there are three ways in which segregation is harmful to prisoners with mental illness. The first lack of social interaction, creates problems itself. The second is that the isolation itself involves significant sensory deprivation. The third is the enforced idleness, permitting no activities or distractions. These factors can exacerbate the prisoners symptoms of mental illness. This condition is known as decompensation, an exacerbation or worsening of symptoms and illness.

The fact is that mentally ill people often have difficulty conforming to prison rules and regulations and are more likely than other prisoners to be cited for disciplinary infractions. In the isolation of these units, there is a very high risk that mentally ill prisoners will decompensate and become more dysfunctional and hard to manage. The evidence at trial is overwhelmingly shows that decompensation is psychologically painful to mentally ill prisoners. "Psychological Pain" includes pain and suffering associated with feelings depressed, anxious, having nightmares, worries, and anxieties. This pain is also experienced as feelings of confusion, of being lost and being misunderstood.

This pain produces suffering, and a delay in treating the condition complicates the condition, can also reduce the chances of a mentally ill prisoner achieving or re-establishing an optimal level of functioning. Decompensation is influenced by environmental circumstances particularly isolation. The psychological associated with →

decompensation can produce in a mentally ill prisoner to desire to commit self-harm. This could occur through what is termed "Command hallucinations".

It can also occur because the prisoner seeks to relieve tension, to get attention, or to replace the psychological pain with physical pain.

Decompensation lengthens the time needed for a mentally ill prisoner cognitive and psychological functioning to be restored and in some cases instances, in some instances life hangs in the balance tragically, a disproportionately high percentage of suicides are committed by prisoners in segregation compared to those in general population.

Farmer received SSII checks from the Government when in society for his mental health, Farmer been in the SHU isolation since January 25, 2021 to the date August 12, 2021 attempted suicide in Dec. 2020. In 2019 since being in Federal custody, Farmer has received dozens of incident reports here in VISR and he has not been out for groups, recreation, despite the fact prison guard brutally beaten and sexually assaulted him, guards never being fired.

Mental health Haeut score the black eyes, lumps on face, deep lacerations blisters where the body chain was handcuffs, shackles ~~go~~ she reported it to S.I.A, medical and S.I.A S.I.S Captain, AW never even spoken to Farmer, medical never taken pictures and threw in a cell without sending Farmer to outside specialist ER to receive adequate health.

care, and Farmer showed the cases above to show psychological pain is real especially when receiving no mental health treatment and dealing with on going physical pain by guards that torture him and still walk by him everyday.

Mental health leaves Farmer in isolation 24 hrs a day.

B. DEFENDANTS VIOLATIONS

- ① Deliberate Indifference,
- ② Inadequate Mental health care.
- ③ Cruel & unusual punishment violating the eighth amendment.

④ Violation officer rules of conduct 3420.11

DEFENDANT# 12 CO WILES
 DEFENDANT# 15 CO DINGRESS
 DEFENDANT# 14 CO FRIEND

26

A. ARGUMENT

① WILES, DINGRESS, FRIEND while Farmer was in body restraints, handcuffs, black box, belly chain shakles these police repeatedly ramming Farmer into the back wall.

② LT. Jones spoken to Dingress & Wiles and were informed to remove Farmer out of the restraints, on June 6, 2021, and they left Farmer in restraints until June 7, 21 AM.

B. DEFENDANTS VIOLATIONS

① Violations of the eighth, fifth, fourth fourteenth amendment to U.S. const. Deprivation due process Substantial due process, violations, cruel and unusual punishment, torture, Deliberate indifference

② violated officer code of conduct 3420.11 and Restraints 5566.06.

1 DEFENDANT # 13 CO WOTRIG

2 DEFENDANT # 16 CO DEEVERS

3 DEFENDANT # 17 CO MCDUFFIE

4 DEFENDANT # 14 CO FRIEND

5 DEFENDANT # 12 CO WILES

6 (A) ARGUMENT

7
8
9 ① CO WOTRIG shut the camera off so
10 LT. B. Jenkins can began his brutal
11 physical beaten.

12 ② WOTRIG, DEEVERS, MCDUFFIE, FRIEND,
13 and Wiles, witness Jenkins brutally beaten Farmer
14 while he was in restraints, on cell one one
15 range and did not intervene, moreover being

16 Spectator

17 (B) DEFENDANT VIOLATIONS

18 ① These Defendants violated the eighth, fifth
19 fourth and Fourteenth amendment,
20 Substantial Due process violations,
21

22 ② These defendants forced cruel and unusual
23 punishment, negligence, Deliberate indifference
24 violated officer code of conduct 3420.11 and
25 Restraints 5566.06.

DEFENDANT # 19

28

GO. GERELD CRUM

A. ARGUMENT

(1) On June sixth approx. 8:00 Am officer's Gereld Crum and unnamed officer was escorting inmate Jeremiah S. Farmer #16931-027 from cell 209 to cell 208 on 4 range in the SHU while Farmer was handcuffed behind his back carrying his own property inside the sheet behind his back words were exchanged between Farmer and officers, and Mr. Crum used excessive force and violated Farmers substantial due process rights slamming Farmer directly to the ground then unnamed officer began bending Farmers legs toward his head, inflicting pain and Farmers back was injured during the incident. Crum then lied on the incident report.

B. DEFENDANTS VIOLATIONS

(2) OFFICERS USED EXCESSIVE FORCE AND VIOLATED FARMERS SUBSTANTIAL DUE PROCESS RIGHTS IN THIS INCIDENT WITH DELIBERATE INDIFFERENCE.

(3) U.S. CONSTITUTION'S EIGHTH, FOURTH AND FOURTEENTH AMENDMENTS AND DUE PROCESS VIOLATIONS.

(4) Crum and officer violated the "OFFICER-
code of Conduct" 3426.11.

1 DEFENDANT # 23 HIXENBAUGH

29

2 DEFENDANT # 23A BARLOW

3 A. ARGUMENT

4
5 ① Hixenbaugh/Barlow has denied Farmer
6 his Due process rights, administrative remedies
7 process, never walking 4 range for 4 plus
8 months, and not responding to the filed
9 BP 8 LT. Coakley, Mental health Havet
10 repeatedly contacted Barlow and
11 Hixenbaugh to come see Farmer and
12 they ignored this. Mental Haeut then
13 delivered Custer multiple times request
14 from Farmer for Barlow/Hixenbaugh
15 to come see farmer for legal copies,
16 legal postage, pickup BP 8 so he won't
17 have to place them in the mail this
18 to was to no avail. Forcing Farmer to
19 mail in the original copies of his legal
20 motions, resulting in the courts forcing
21 Farmer to pay for copies of the motions
22 a fee of 50¢ per page, specifically now
23 Farmer has to pay \$91⁰⁰ for copies of his
24 civil complaint in Indiana US Dist court

25 ③ DEFENDANTS VIOLATIONS

26 ① Defendants violated deprivation of
27 the administrative remedies process
28 Due process violations and
29 officer code of conduct, 3420.11.

30 ② By not walking providing copies Farmer has
to pay \$9200 August 8, 21 to US Court
in Hammond IN. CUSTER took over not I have
been receiving legal process. He does great job.

DEFENDANT # 24

(30)

DHO CRADDCK

A. ARGUMENT

FD On June 8, or 9 2021 Farmer scene DHO Craddock about the June 6, 21 excessive force, substantial due process violation being slammed to the ground while handcuffed incident report, and Gerold Crum false reported allegeding that I threaten to kill staff, and while at this hearing Craddock scene both of my eyes black, busted lip, blisters on my wrist from tightness of handcuffs, blisters on my ankles from tightness of shackles, blisters around my stomach sides back from tightness of belly chain, bent fingers thumbs and that's from B Jenkins, I turned in BP 10 to Craddock about me being beaten and he said that he has to report Police misconduct. & Continued the hearing.

(2) While at this DHO I was scene by medical Nurse McKenzie/Thorpe about my ear pain, headaches, back, finger, thumb pain.

(3) Sometime within approx 1-2 weeks after this DHO hearing, Farmer had another hearing and reported the sexual assault by LT. Coakley and DHO Craddock said these are serious allegations he must report, I again filed sensitive BP 10 with Craddock due to administration not responding or counsellor Barlow responding. Today is August 10, 2021.

B. DEFENDANT VIOLATIONS

FD US Const. Due process violations for not reporting BP 10 or to PREA as Farmer requested.

medical pg. 1

31

DEFENDANT # 27

MEDICAL SUPERVISOR MIMS

DEFENDANT # 26 PILES

A. ARGUMENT

- ① supervisor mims received notice by medical employees of the severe injuries that Farmer received, on June 6, 21, and June 7, 21 and Farmer was seen 2 weeks later for X-rays, medical discovered the busted left ear drum, wrist, thumb right hand pinky right hand injury.
- ② medical nurses reported Farmer having black eyes, swollen eyes, busted lip, deep lacerations blisters from restraints, scarring on penis from LT. coshly burning to back pain, nose inflated pain now can't fully breath out of it, lost of feeling in right thumb, left wrist still. Mims won't send Farmer out for professional services, or increase his gabapentin.
- ③ NURSES McKenzie, HANA, Thorpe, Gram, Fox, Hair, And Armet reported the injuries Farmer sustained and Mims provided no further medical care, or even taken pictures of Farmer's injuries.
- ④ Piles scene Farmer for his 6 month review wouldn't let Farmer speak about all his injuries and walk away and regional only up Gabapentin looming.
- ⑤ Farmer has filed dozens of request to medical and about his injuries, pain and they refuse to respond.

medical pg 2

32

⑥ MIMS ignores medical procedure and instead allow prison custody staff & administration to dictate what they do such as providing no medical care after Farmer was brutally beaten and sexually assaulted by prison guards, receiving two black eyes, bruises, lumps, on face, busted & damaged nose, lip, wrist, right thumb, pinky, lost of feeling in right thumb and right wrist, busted left ear drum, deep lacerations around stomach, sides back, wrist, ankles, with major blistering, back, leg pain, all caused from June 6, and June 7, 2021 attacking, torture and cruel & unusual punishment by prison guards.

Nurses McKenzie, Thorpe, Gram repeatedly scene my condition on June 6, 2021, even seeing blood splatters on the walls, and Nurse Hana on June 7, 21 approx. 7-8:00 AM with LT. Cookley come in the cell while handcuffed, black box, belly chain, shackles, check my vitals and left approx 2-5 min. while in cell one on one range.

Medical was denied taking pictures of the injuries on June 6, June 7, 2021 and period.

Medical never taken pictures of any injuries and waited 2 weeks until June 16, 21 to take X-rays of back, finger, nose, and to determine that Farmers left ear drum had been busted and claim they will send out Farmer to a ear specialist, and nurses said my finger thumb has damaged tendons, and my back X-rays shows L3, L4, L5, lumbar minus the most pain

MEDICAL PG 7

33

Today August 10, 21 Farmer has been left in a cell without being further seen by outside specialist for his busted left ear drum, lost of hearing and pain in his ear; for his back leg nerve pain or worst, despite what the X-rays showed of his already documented L3, L4, L5 herniated disks, still not sent to outside specialist and nurse piles up his gabapentin "only" 100 mg which has offered little or no relief; No relief for damaged pinky, thumb that is bend, looking out of normal, causing pain, nurses said it was tendons, nurse McKenzie, Fox, and LT Carr said to just keep bending it; and never being sent out for this damaged tendons; or never being sent out for damaged right wrist, or lost of feeling in right thumb top of left wrist; And medical never respond to request, and administration deprivation of the administrative remedy process. All which has been torture to remain in a cell without going to outside specialist, 24 hour pain & suffering.

(B) DEFENDANT'S VIOLATIONS

① U.S. CONST. VIOLATIONS EIGHTH, FIFTH, FOURTH & FOURTEENTH AMENDMENT VIOLATIONS.

② DELAY IN MEDICAL TREATMENT; DELIBERATE INDIFFERENCE; CRUEL AND UNUSUAL PUNISHMENT WITH A MALICIOUS AND SADISTIC INTENT.

- ① MIMS received reports from Mental Health Haout regarding the injuries Farmer sustain and it was reported on June 8, 21 by mental health even specifically stating it needs to be cleaned she was concerned about infection, and they never even looked at the blisters, etc---
- ② Mental Health Haout, Nurse Munney reported Sexual assault and Munney, sawe fresh wounds on my penis from LT. Coakley burning it and it was reported to MIMS and Medical never looked at it, and Sals. Cruz taken pictures and medical still turned a blind eye.

PLAINTIFFS WITNESSES TO SEEING INJURIES ON FARMER.

- | | |
|---|---------------------|
| ① Deavers | ③ Nurses; McKinney; |
| ② McDuffy | ③② HANA |
| ③ LT. Coakley | ③③ HARR |
| ④ LT. B. Jenkins | ③④ FOX |
| ⑤ Friend | ③⑤ Grahm |
| ⑥ WOTRIG | ③⑥ Thorpe |
| ⑦ Gerald Crum | ③⑦ Arnold et al. |
| ⑧ Butler | |
| ⑨ Vernon | |
| ⑩ Parker | |
| ⑪ Keyer | |
| ⑫ Silis, LT. CRUZ | |
| ⑬ LT. CARR | |
| ⑭ C. DAVIS | |
| ⑮ Knight | |
| ⑯ Roush | |
| ⑰ WILES | |
| ⑱ DINGRESS | |
| ⑲ MARSHAL | |
| ⑳ Fired LT WARE | |
| ㉑ Cellmate Major neo McCoy 52248-464 | |
| ㉒ DHO CRADDOCK | |
| ㉓ 6-11-21 DZUBAK & SHIRK 4 range. | |
| ㉔ G. Miller 6-10-21 between 2:00-2:40 pm 4 range. | |
| ㉕ LT. WARE June 13, 21 9:30-10:00 am 4 range | |
| ㉖ Kyer | |
| ㉗ June 22, 21 chaplin Keyer at 9:00-9:17 am 4 range | |
| ㉘ Captain | |
| ㉙ AW Gabby | |
| ㉚ Ellis, | |

36

WHEREFORE THIS 42 USC, 1983 (BIVENS)
Complaint is based on facts supported
by a preponderance of evidence.

CERTIFICATE OF SERVICE

I hereby the undersigned Jeremiah Farmer
hereby certify that on this August 12, 21
day a copy of this Complaint was
forwarded to US Dist Court, WV by
via postal mail service to the
following address;

⑦ U.S. DIST. COURT.
P.O. Box 1518
ELKINS, WV
26241

ATTN: CERTIFY
All mail going
to plaintiff so
he has to sign
for it.

Respectfully Submitted
Jeremiah Farmer
pro-se-plaintiff
Jeremiah S. Farmer #16931-027
US D Hazelton
P.O. Box 2000
Brucecum Mills, WV
26525

Thank You much GOD BLESS!!

AFFIDAVIT / DECLARATION ~~X1~~

6-27-21

Comes now, Inmate Jeremiah S. Farmer #16931-027, and Submits the Following declaration in support of the beating and sexual assault Farmer received on 6-6-21 and 6-7-21 by police; When my cellie Jeremiah Shane Farmer came back from where ever the C.O. took him to he came back with black eyes bruises all over his face mark & open lacerations all around his waist around his wrist & ankles & burn mark above his penis & I couldn't believe what I saw & the crazy part that when they took him from our cell he didn't do anything wrong that I could see & they throw him on the floor & then they bring him up to his feet & took him off. He ask the C.O. countless of times to go to the Law Library & they never let him go they took both our commissary slip from the other commissary slip in the pound. I just don't understand why all this stuff is happening for no reason.

Respectfully Submitted
 /s/ Major NEO McCoy III

I declare under penalty of perjury that the foregoing is true and correct. Executed on 6-27-21

Respectfully Submitted
 /s/ Major NEO McCoy III
 Major NEO McCoy III 52248-42
 U.S.P. Hazelton P.O. Box 2000
 Bructon Mills WV 26625

Federal Bureau of Prisons

Type or use ball-point pen. If attachments are needed, submit four copies. One copy of the completed BP-229(13) including any attachments must be submitted with this appeal.

From: EARNICE JERONIA S 16931-027 (SNW) H.U.S.P
 LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

Part A - REASON FOR APPEAL

THIS IS A REQUEST TO I BEEN HERE AT HAZELB
FOR OVER 1 MONTH. I FILED BP-8 BP-9 AND REQUESTED NEW GETTING
A RESPONSE. I'M CURRENTLY ON Gabapentin BOUING IN MURKIN AND
AT NIGHT I SPOKE TO HEALTH AND NURSE HAS HADOWN I CAME IN
BOP IN 2017 I WAS ON 1200mg IN THE MORNING AND AT NIGHT
ON Gabapentin WHICH REALLY HELP WITH MY STOMACH PAIN. THEN
THEY STOPPED IT. THEN I WENT TO OUTSIDE SPECIALIST AND THEY PUT
ME BACK ON Gabapentin. FOR MY CHRONIC NERVE PAIN. IN 2018 I
IN REQUESTING FOR MY Gabapentin TO BE RAISED TO HELP WITH MY
NERVE PAIN IN MY LOWER BACK, LEGS ETC. I HAVE EXTENSIVE BLEEDING
ON MY CHICAGO HAS ME IN TO RECEIVE A COLONY. I WAS WITH NURSE
DOCTOR HERE WERE NOTIFIED OF MY STOMACH PAIN PULLING OUT
AND NOTHING WAS SCHEDULED TO A OUTSIDE SPECIALIST
PLEASE HELP ME.

DATE

SIGNATURE OF REQUESTER

Part B - RESPONSE

DATE

REGIONAL DIRECTOR

If dissatisfied with this response, you may appeal to the General Counsel. Your appeal must be received in the General Counsel's Office within 30 calendar days of the date of this response.

FIRST COPY: REGIONAL FILE COPY

CASE NUMBER: _____

Part C - RECEIPT

CASE NUMBER: _____

Return to: _____
 LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

SUBJECT: _____

DATE

SIGNATURE, RECIPIENT OF REGIONAL APPEAL

X3

Type or use ball-point pen. If attachments are needed, submit four copies. Additional instructions on reverse.

From: FARMER Jeremiah S. 16931-027 SHU USP Hazelton
LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

Part A- INMATE REQUEST

I'm forwarding this BPG to regional office in Atlanta because USP Hazelton never responds to any BPG. This is sensitive because my life is in danger from Hazelton Correctional officers. See as follows:

Around 8:20 I was being escorted by Crum and another officer I believe Sidingres was his name. He told me I'm not R-Kelly I will kill you USP Hazelton style. I turn to face him using profanity. Then Crum as I was handcuffed behind my back holding my proper tied in a sheet Mr. Crum use excessive force by slamming to the ground. Cracking my lower back, and injuring my hip left him with major bruising. I was then taken by LT. Coakly and officers to be stripped of my clothing and put paper clothes on me.

7-15-21
DATE

Jeremiah S. Farmer
SIGNATURE OF REQUESTER

Part B- RESPONSE

REMEDY ID: 1086072-R1

DATE

WARDEN OR REGIONAL DIRECTOR

If dissatisfied with this response, you may appeal to the Regional Director. Your appeal must be received in the Regional Office within 20 calendar days of the date of this response.

FIRST COPY: WARDEN'S ADMINISTRATIVE REMEDY FILE

CASE NUMBER: _____

CASE NUMBER: _____

Part C- RECEIPT

Return to:

LAST NAME, FIRST, MIDDLE INITIAL

REG. NO.

UNIT

INSTITUTION

SUBJECT: _____

DATE

RECIPIENT'S SIGNATURE (STAFF MEMBER)

USP LVN



PRINTED ON RECYCLED PAPER

BP-229(13)
APRIL 1982

X 21

Type or use ball-point pen. If attachments are needed, submit four copies. Additional instructions on reverse.

From: FARMER, JORMAH S 16931-027 SHU Hazleton
LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

Part A- INMATE REQUEST

On June 6, 21 Officer Gould came slam me to the floor while I was handcuffed behind my back. LT. Coughlin then had me wrapped up and stripped out of my clothes taken to one range cell one. LT. B Jenkins while I was handcuffed behind my back with nothing working the camera sensors had nothing shut the camera off as Beaver, Fl and McDuffy leaned on the wall Jenkins began beating both sides of my face blood splattered on the wall. LT. Coughlin then wrapped body chain handcuff shackles as tight as it can be then ask me "Remember the two people you killed with a hammer?" I told him I did not do that. He left. Wiles, Dingler, tried at random times would
June 11-21

DATE

SIGNATURE OF REQUESTER

Part B- RESPONSE

DATE

WARDEN OR REGIONAL DIRECTOR

If dissatisfied with this response, you may appeal to the Regional Director. Your appeal must be received in the Regional Office within 20-calendar days of the date of this response.

FIRST COPY: WARDEN'S ADMINISTRATIVE REMEDY FILE

CASE NUMBER: _____

CASE NUMBER: _____

Part C- RECEIPT

Return to: _____
LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

SUBJECT: _____

DATE

RECIPIENT'S SIGNATURE (STAFF MEMBER)

FCC HAZELTON SICK CALL FORM

(Circle one)

MEDICAL

DENTAL

COP-OUT

Only **ONE** topic only per sheet. Use **ONLY** the space below (do not write on the back).
Submit this form to medical staff.

NAME: Jeoman S. FerrerREG #: 16931-0277HOUSNG UNIT / CELL: SHU 209DATE: 7-14-21

1 WHAT IS YOUR CONCERN? Hello, reason for this request is to inform you that the 300mg increase for my gabapentin made little difference and I'm requesting another 300mg increase. My next back leg nerve pain really affects me.

2 Next, my pinches has not healed and look all broken but medical records x-rays said its not broken also scars on my penis from being burned by cigarette and scars on stomach sides needs treatment
3 my left ear drum still has not healed and still loss of hearing
4 in my left ear.

When did this start? / How long have you had the problem? 6-6-21 staff heard.

----- (Do not write below the line, STAFF ONLY) -----

____ You are being referred to Commissary to purchase: _____

____ This is a chronic care issue and will be addressed at the next chronic care visit.

____ This is a mental health issue. Please see Psychology in order to be assessed.

- ① You have an upcoming F/U.
- ② XRAY ⊖
- ③ Purchase triple antibiotic from Commissary
- ④ You are pending evaluation from ENT.

J Bond, PAC or 11/21/21

PAGE 3 of 8

- ⑦ from 10:00-9:00 Dingress, Wiles would come in the cell on 6-6-21 and have me face the wall and Wiles would charge in ramming me against the wall Dingress said this is what happens when you disrespect staff and they never gave me lunch look on camera.
- ⑧ Nurse McKenzie, Thorpe came in with staff do to the cuffs shackles being on to tight.
- ⑨ I told ROUSH & C. DAVIS the restraints is causing me pain, to call LT. and they did and LT CARR, Marshal Nurse McKenzie, Thorpe, GRAM come in and to do my vitals but LT CARR made them leave before that happened due to me pointing out all the blood on the walls, floors from police beating me up. Then I ask CARR to loosen up the restraints he said No, that's Cookly doing, he want mess with it. They left.
- ⑩ Between 12:00 - 2:00 AM on 6-7-21 I showed C. DAVIS my hands swollen up twice it's normal size, hands black purple blue, toes, feet, toe nails purple from the tightness of the shackles, handcuffs, black box, belly chain that Cookly put on me at 8-9 AM on 6-6-21 leaving it on preventing me from able to use restroom or eat.
- ⑪ Between 2:00 AM - 3:00 AM on 6-7-21 I lost consciousness awoken in my urine in feces and LT CARR telling me to get up, I told him I can't pain, and also I felt mentally not able to, CARR & Marshal came in CARR lifted me up out of my feces urine put me on the bed, he did not call medical, but when I begged for him to loosen up my restraints he said No cookly done it. I told him that when those 3 nurses are subpoena they will tell the truth and my condition is on his watch.

PAGE 1 OF 3

and he looked at Marshal told him to not tell Coakly and he began loosening my restraints & left

(12) Between 7-8 AM on 6-7-21 Coakly & nurse Hahn come so Hahn can check my vitals, and she left, Coakly stepped in the cell removed the black box, belly chain and left leaving handcuffs and shackles on me

(13) Between 8-9:00 AM Wiles and officer removed me from one range cell one escorted me back to my cell with my celly Major Neo McCoy III #52248-464 and he was shocked by my black eyes, busted lip bruises on my face, my lost of hearing in my left ear, deep lacerations around my stomach, sides, back from the belly chain, and around my wrist, ankles from hand cuffs and shackles, all leaving dozens of blisters

(14) On June 8 or June 9 2021 I met with DHO Craddock and showed him my injuries, and told him what happened with police beating me, torturing me on June 6 2021 through June 7, 2021 he said he has to report police misconduct and continued the hearing because I requested video evidence, and I met with mental health Ms. Huaet and reported it to her, and she said she sent Silia a email.

(15) Wiles given me a Commissary Sheet on 6-7-21 and picked it out of my door on 6-7-21 and on 6-9-21 when Commissary come me and my celly Major Neo McCoy III #52248-464 did not receive no commissary the staff took both of our sheets out preventing us from getting stamps envelopes for legal purposes violating due process

PAGE 5 of 8

- (16). On 6-10-21 between 2:00-2:40 pm I scene G. MILLER complain about my pain and my injuries I received from staff and showed him.
- (17). On 6-11-21 I spoke to DZURAK & SHIRK showed them both complained about pain, not seeing medical. Shirk wrote it down and said he will call them, medical never came.
- (18). 6-12-21 spoke to nurse behn.
- (19). 6-13-21 spoke to LT. WARR and he was with Beavers and I showed him my injuries.
- (20). 6-12-21 spoke to nurse HAIR he ordered me ointment for the deep lacerations, blisters from restraints.
- (21). 6-16-21 scene by medical received X-rays, and flushed out my left ear and noticed my left ear drum was busted by Jenkins.
- (22). 6-17-21 scene nurse Armel explained my severe back pain. She offered no relief and refused to take pictures of my injuries.
- (23). 6-18-21 Nurse Mckenzie reported my sexual assault to Silis.
- (24). Chaplin Kyce on 6-22-21 9-9:30 Am states he will report the sexual assault and physical assault to outside authorities because I told him Silis or Sila or Captain, or Warden never spoke to me and avoid doing rounds on my range since I was beaten and sexually assaulted by staff on 6-6-21 & 6-7-21.
- (25). On 6-7-21; 6-21-21 I've turned in 3 sensitive BP-10 and 2 to central office about me being physically and sexually assaulted by police never receiving a response back.

(27) 6-22-21 Silis. LT. Cruz, walked my range & range while me and my celly was sleeping never talking to me.

(29) On 6-24-21 LT CRUZ with another S.I.S between 1:00-1:20 Am met with me, CRUZ claims he never heard about this incident which was a lie, several staff has reported it to S.I.S & S.I.A. they taken pictures of my scars on my penis, around my stomach and sides all scars from H. Lathin de la Cruz D IT Corral.

PAGE 1 of 8

CONCLUSION: Mr. Farmer has suffered traumatically from the physical, sexual assault that he was tortured, restraint over 24 hours from 6-6-21 8:00-9:00 AM until 6-7-21 8:00-9:00 AM, and he has been denied library legal services, legal copies, C1 case manager has not walked my range in over 8 weeks, and LT. Cookly, Ellis and Mental health Mr. Huact has sent them emails, spoken to them and still never coming to help with legal copies. Or legal postage. And I am being denied the administrative remedies process due to Hazelton officials interfering purposely preventing the administrative process from being successfully completed. this happens to numerous inmates here, do history check.

My appeal rights have been violated, by not being allowed to legal law Library. Due process rights being violated, all due to the misconduct by the Hazelton administration.

My life is in immediate danger with these police, and I have permanent scars busted left ear drum with lost of hearing in my left ear, police walk every 30 min. and I am terrified that will be when they tell me to cuff up and escort me to my execution while all turns a blind eye. Theres many inmates that are beaten here by police, look at the history, and Administration turns a blind eye and prevents the administrative remedy process from being completed.

PAGE 8 of 8

Police that beaten me physically, sexually assaulted me, tortured me, LT Coahly, B Jenkins, Wiler, Dingress Friend, Watling still works here and putting other inmates life in danger. I am seeking a INDUCTIVE Relief Immediate emergency transfer.

Respectfully Submitted
/s/ Jeremiah S. Farmer

Prose, Jeremiah S. Farmer #16931-027

“ I DECLARE UNDER PENALTY OF PERJURY THAT
THE FOREGOING IS TRUE AND CORRECT
EXECUTED ON 6-28-21.

RESPECTFULLY SUBMITTED
/s/ Jeremiah S. Farmer
PRO-SE JEREMIAH S. FARMER
Register #16931-027
U.S.P HAZELTON
P.O. BOX 2000
BRUCETON MILLS, WV
26525

A-774
 HAZELTON Police
 Deputy beater me, my friend
 security guards, staff tried
 leaving us, to later

NUMBER: HAX-1330.18C
 DATE: July 24, 2019
 SUBJECT: Administrative Remedy
 Program
 PAGE: 10

ATTACHMENT B

Federal Correctional Complex Hazelton
 Request for Administrative Remedy
 Informal Resolution Form - Non General Population

Notice to Inmates: Prior to receiving a Request for Administrative Remedy Form (BP-229), you MUST attempt Informal Resolution through your Counselor, or provide other documentary evidence of your attempt at informal resolution. Failing to attempt informal resolution may result with rejection of your request.

Part A					
Inmate Name:		Reg. No.:		Unit:	
Jeremiah Farmer		16931-027		SHU.	
1. Specific Complaint: ① physical & sexual assault by police; ② Deprivation of Administrative remedy process; ③ Deprivation due process law denied legal services; ④ Delay in medical treatment & Deliberate indifference.					
2. Relief Requested: ① Lt. Coakley & Lt. Jenkins Ared for there violations in office code of conduct 3420.11 and restraints 5566.06 contact PPEA 28C.F.R. 1115, allow my library services for direct appeal and administrative remedy process medical care.					
Part B					
1. Counselor's Efforts:					
Referred to SIS					
Part C					
	Issue Resolved	Comments:			
	Relief granted				
✓	Issue Un-resolved No Relief granted	Comments: The time period for Administrative Remedy has expired, however			
✓	Unable to Address Issue Referred	Comments: All allegations of staff misconduct are taken seriously. Your issues have been forwarded to Administrative staff for review & investigation.			
Inmate Signature:		Date:			
Staff Signature:		Date: 8/11/21			
Unit Manager Signature:		Date: 8/11/21			
Counselor Tracking					
Tracking #	Event Date	+ 20 Days	Form Issued	BP-9 Issued	BP-9 Returned
C1-0387					

Continuation page: X 7-1

- ① On June 6 2021 Custody Gerald Crum violated my substantial due process rights slamming me while handcuffed behind my back.
- ② LT. Coakley put me in restraints burned my penis left me in restraints black box 24 hrs preventing me for bathroom. The belly chain, handcuff shackles was put on so tight it left deep lacerations, blisters, scars.
- ③ LT. B. Jenkins brutally beaten me busted my left ear drum, blacked both eyes, busted lip, twisted injured my fingers and thumb. Officer friend, wife, Worthing, Dargess, MI and Duffie witnessed this and did not intervene.
- ④ On June 6, 21 medical determine my left ear drum was busted. Nurses HANA, McKenzie, Thorpe, Grams, Fox, Hair, all scene both eyes black, fat lip, busted ear drum, deep lacerations blisters and custody did not take picture.
- ⑤ Solid LT. Cruz did not interview me until June 24, 21 for 5 min. only taken pics of scars forming on my penis from Coakley burning it and from restraints, then said he was not aware of this incident on June 6, 21 despite the fact Mental Health Healt reported it on June 8, DHO reported it on June 8, and Nurse McKenzie reported it on June 18, 21. Then
- ⑥ My Administrative remedies process has been denied AW assistant won't return my BP9, CI Barlow won't return BP8.
- ⑦ I'm denied outside medical care leaving me in pain. The evidence is clear everyone trying to cover up what they cannot cover up.

Relief Requested: Medical Care, firing Coakley, B. Jenkins, Give me library services for my Aug. 23, 21 appeal deadline, Give me access to my legal material in K&D.

Top Notch Security

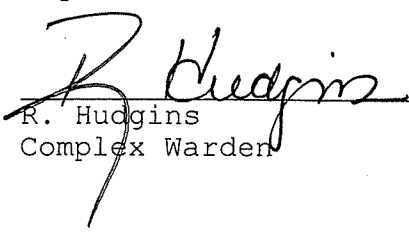
REQUEST FOR ADMINISTRATIVE REMEDY
ADMINISTRATIVE REMEDY #1091621-F1

This is in response to your Administrative Remedy received on August 19, 2021 in which you request a meeting with SIS due to allegations of PREA and staff assault.

Please be advised that the SIS Department has met with you regarding this matter and any questions or concerns should have been addressed during this meeting. Should any further action be necessary, such action will be taken, however, these matters are not subject to inmate review. Additionally, details regarding the review or review process are not authorized for disclosure, and should the reviewer deem it necessary to interview you, you will be notified. Please be advised that we take all allegations of staff misconduct very seriously, as we expect Federal Bureau of Prisons staff to exhibit high standards of professionalism at all times.

Therefore, this response to your Request for Administrative Remedy is for informational purposes only.

If dissatisfied with this response, you may appeal to the Mid-Atlantic Regional Director, Federal Bureau of Prisons, 302 Sentinel Drive, Suite 200, Annapolis Junction, Maryland 20701. Your appeal must be received in the Regional Office within 20 days of the date of this response.


R. Hudgins
Complex Warden

8/25/2021
Date

AFFIDAVIT/DECLARATION PAGE 7 OF 8 X6

Comes now, Inmate Jeremiah S. Farmer, #16931-027, and submits the following declaration in support of the central office complaint, stating the following:

- ① My life is in immediate danger from the Hazelton U.S.P. police and administration, that maliciously and sadistically beaten Farmer, sexually assaulted Farmer, and turns a blind eye.
- ② U.S.P. Hazelton administration/officers tamper with and interfere with the Administrative remedy process on all levels, never receiving any BP8-BP9- BP10- or central office complaints back.
- ③ U.S.P. Hazelton does not allow legal mail to be sealed up, and does not allow Farmer to do certified mail.
- ④ On June 6, 21 Gerald Crum substantially violated Farmer's due process rights by slamming him to the ground while handcuffed behind his back holding his personal property in a sheet, then falsifies a incident report stating I threaten to kill police and was swinging my head around trying to assault officers.
- ⑤ June 6, 21 LT Cakley, Wiles, Watng, Friend stripped Farmer out of his clothes, put handcuffs, shackles on and while Watng video taped it forcibly hurting Farmer's back then putting him in a wheel chair, pushing him to cell one, one range.
- ⑥ While Farmer was handcuffed behind his back shackles Wiles, Friend etc. made Farmer face the back wall where officers then charged in slamming Farmer to the wall repeatedly causing pain, then LT B Jenkins with Beavers, McDuffy with Watng working the camera took a picture of Farmer then Jenkins said something to Watng then Watng turned around shut the camera off and Jenkins told Wiles, Friend to let me go for me to stand in

~~Page 2 of 8~~

front of him I told him I didn't do anything" I didn't do shit, and he punched me in my left ear popping it and hurting it, I repeated I didn't do shit he then punched me on my right side and this process happen repeatedly. leaving my left ear drum busted, two black eyes, bruises on my face, busted lip.

⑦ LT Coakly with Wiles, younger officer and others put a belly chain around my stomach side back, handcuffs, black box shackles on as tight as they can go, even locking the skin on my stomach in the black box, Coakly ask for a cigarette as guards was pressing my head to the left, where Coakly sat, and someone said here I believe it was Wiles then Coakly leaned forward toward my groin and said remember those two people you killed, I said I didn't do that, then I felt my penis being exposed and a sharp pain, burn on my penis I screamed and it happen again and Coakly left out the cell.

⑧ Wiles, Friend Dingress made me stand against the back wall facing it, they charged in ramming me repeatedly causing severe pain on my back, where the belly chain was tight, black, box, handcuffs, then B. JENKINS came and began twisting my fingers, thumbs, and encouraging me to spitt and head butt him so he can kill me and falsify the report and he'll get away with it, only if you knew he said. He also said he will lie and say I broke the black box, handcuffs, and I can't remember the rest, but he did say I'm a different type of LT.